

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
:
UNITED STATES OF AMERICA
:
-v- : GOVERNMENT'S FORFEITURE
:< BILL OF PARTICULARS
MARK S. SCOTT,
:
S6 17 Cr. 630 (ER)
:
Defendant.
----- X

Pursuant to *United States v. Grammatikos*, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offense described in Count One of the Superseding Indictment, and as alleged in the Forfeiture Allegation therein, includes the following:

- a. \$2,455,686.10 held at Iberia Bank (formerly known as Sabadell United Bank) Account Number [REDACTED] 9788 received from or on behalf of Mark. S. Scott and/or related companies, by [REDACTED];
- b. Any and all funds on deposit in Account Number [REDACTED] 1046 in Iberia Bank (formerly known as Sabadell United Bank) received from or on behalf of Mark. S. Scott and/or related companies, by [REDACTED];
- c. Any and all funds on deposit in Account Number 40077102 held in the name of MSS International Consultants (BVI), Ltd., at DMS Bank and Trust Ltd;
- d. Any and all funds on deposit in Account Number 40077100 held in the name of MSS International Consultants (BVI), Ltd., at DMS Bank and Trust Ltd;
- e. Any and all funds on deposit in Account Number 10462701 held in the name of MSS International Consultants (BVI), Ltd., at First Caribbean International Bank;

- f. Any and all funds on deposit in Account Number 10465454 held in the name of DRP Holdings, Ltd., at First Caribbean International Bank;
- g. Any and all funds on deposit in Account Number 10465343, held in the name of MSS Marine Group, Ltd., at First Caribbean International Bank;
- h. Any and all funds on deposit in Account Number 10463883, held in the name of EGD Investment, Ltd., at First Caribbean International Bank;
- i. Any and all funds on deposit in Account Number 10465346, held in the name of Mumbelli Group Holding (Cayman), Ltd., at First Caribbean International Bank;
- j. Any and all funds on deposit in Account Number 2450478611, held in the name of HFT Holding Limited, at RBC Dominion Securities Global Ltd.;
- k. Any and all funds on deposit in Account Number CH3508565559929606901, held in the name of Mark S. Scott, at Dreyfus Sohne & Cie AG;
- l. Any and all funds on deposit in Account Number [REDACTED] 1054, held in the name of Mark S. Scott and [REDACTED], at Cooperative Bank of Cape Cod;
- m. Any and all funds on deposit in Account Number 2840912613, held in the name of Mark S. Scott, at Northern Trust Company;
- n. Any and all funds on deposit in Account Number 2840909434, held in the name of Mark S. Scott, at Northern Trust Company;
- o. Any and all funds on deposit in Account Number 43-98797, held in the name of Mark S. Scott, at Northern Trust Company;
- p. Any and all funds on deposit in Account Number [REDACTED] 0306, held in the name of [REDACTED], [REDACTED], and/or [REDACTED], at Ocean Bank;
- q. Any and all funds on deposit in Account Number PWA5493, held in the name of Mark S. Scott, at UBS Financial Services;
- r. Any and all funds on deposit in Account Number PWB1979, held in the name of Mark S. Scott, at UBS Financial Services;
- s. Any and all funds on deposit in Account Number [REDACTED] 9666, held in the name of Mark S. Scott and [REDACTED], at UBS Financial Services;

- t. Any and all funds on deposit in Account Number 4842-9048, held in the name of Mark S. Scott 2017 Trust, at Wells Fargo Advisors;
- u. One 2017 Sunseeker 57 Predator Yacht, seized by the Internal Revenue Service (“IRS”) on or about September 5, 2018 (the “2017 Sunseeker”);
- v. One 2016 White Porsche 911 GT3 RS, bearing Vehicle Identification Number WP0AF2A92GS195089 and containing License Plate Number DVADER3, (the “2016 Porsche”);
- w. One 2017 Red Porsche 911 4S Turbo, bearing Vehicle Identification Number, WP0CD2A95HS178187 and containing License Plate Number HBNJ81, (the “2017 Porsche”);
- x. One 2018 White Porsche 911 GT2 RS, bearing Vehicle Identification Number, WP0AE2A91JS185471, (the “2018 White Porsche”);
- y. All right, title and interest in real Properties located at 31 Dale Avenue, Hyannis Port, Massachusetts owned by MSSI 31 Dale Ave Property Group LLC, with all improvements, appurtenances, and attachments thereon;
- z. All right, title and interest in real Properties located at 105 Sunset Lane, Barnstable, Massachusetts 02630 owned by MSSI 105 Sunset Ln Property Group LLC, with all improvements, appurtenances, attachments thereon;
- aa. All right, title and interest in real Properties located at 133 Sunset Lane Barnstable, Massachusetts 02630, with all improvements, appurtenances, and attachments thereon;
- bb. Any and all items of value seized on or about September 5, 2018, from 133 Sunset Lane Barnstable, Massachusetts 02630 (the “Sunset Lane Items of Value”), including but not limited to the following:
 - i. One Panerai PAM 582 barometer wall clock;
 - ii. One Panerai PAM 583 thermometer;
 - iii. One Panerai PAM 584 hygrometer;
 - iv. One Panerai PAM 585 wall clock;
 - v. One Luminor Panerai P068/400 BB1577049;
 - vi. 3 Purses – One Black Hermes, One Brown/Tan Hermes, and One Green Hermes;
 - vii. One Ring with stone;

- cc. All right, title and interest in real Properties located at 600 Coral Way, Suite/Floor 12, Segovia Tower, Coral Gables, Florida 33134, with all improvements, appurtenances, and attachments thereon;
- dd. Any and all items of value seized on or about September 5, 2018, from 600 Coral Way, Suite/Floor 12, Segovia Tower, Coral Gables, Florida 33134 (the “Coral Way Items of Value”), including but not limited to the following:
 - i. One Black Hermes Birkin Bag;
 - ii. One Orange Hermes Birkin Bag;
 - iii. One Heckler & Koch 40 MM gun, Serial No.: 219-004106
 - iv. One Heckler & Koch 45 MM gun, Serial No.: HKU004967
 - v. One Desert Eagle SOAE, Serial No.: DK0038257
 - vi. One Smith and Wesson, Serial No.: DJW0604
 - vii. One Beretta Shotgun and leather case;

((a) through (dd) the “Specific Property”)

Dated: New York, New York
February 22, 2019

Respectfully Submitted,
GEOFFREY S. BERMAN
United States Attorney

By: /s/ Christopher J. DiMase
CHRISTOPHER J. DIMASE
Assistant United States Attorney
Tel: (212) 637-2433